

Van Waters & Rogers  
COD075770560

## RCRA INSPECTION REPORT

On February 26, 1981, at 1:30 p.m., a RCRA compliance inspection was conducted at Van Waters & Rogers, I.D. #COD075770560. The facility is located at 4300 Holly Street in Denver, Colorado. Mr. Robert Patrick, the Operations Manager, was contacted prior to the inspection and this time and date was agreed upon.

The weather conditions at the time of the inspection were cloudy and approximately 45 degrees F.

The survey participants were:

Diana Shannon, EPA, 8AH-WM  
Loys Parrish, EPA, S&A  
Robert Patrick, Operation Manager  
Robert Marks, Warehouse Manager.

The inspectors presented their credentials when they met the facility representatives.

The facility notified as a GENERATOR, TRANSPORTER, and TREAT/STORE/DISPOSE. Mr. Patrick said that this facility does not generate over the small quantity limit of hazardous waste, but that the company chose to notify as such for future activities. Mr. Patrick explained that the company intends to begin a solvent recycling operation in the future. He could give no indication when this would commence. This operation will involve transporting of spent chlorinated and fluorinated solvents; storage of these spent solvents; and generation of still bottoms from the distillation process.

The survey participants discussed the hazardous waste streams presently being generated by Van Waters & Rogers. The facility rinses empty drums that once contained acids or bases, (i.e. hydrochloric acid, nitric acid, sulfuric acid, caustic soda). Mr. Patrick said that they do not receive "empty" containers that have greater than a ½ inch residue. The containers are flushed with five quarts of water and the rinseate is collected in a 150 gallon tank. When the tank is approaching fullness, the pH is checked, the solution neutralized and then it is discharged to the sewer system.

The inspectors were told that there is a spill tank which collects any leakage and run-off from the chemical drum storage area. The area has a black top and concrete surface and it slopes towards the spill tank. Mr. Patrick said that they have not had a spill from the chemical drum storage area. He added that the rain and snow run-off fills up the spill

tank and they have to pump it periodically. The underground tank capacity is 1,000 gallons.

The survey participants walked through the drum storage area, viewed the rinseate tank, the spill tank, and the chemical tank storage area. The inspectors noted spillage of a liquid on the concrete of the drum storage area. There was a trail leading to a solvent drum which had a puncture mark in it. Mr. Patrick explained that the drum was probably ruptured during handling and that the material left in the drum would be reclaimed. The spillage was very small and extended only a few feet from the drums. The inspectors noted that the chemical tanks were stored in a diked area. The rinseate tank was a small above ground tank that was moved, after neutralization, to be discharged to the sewer.

The inspection did not include a survey of the records and plans required under the RCRA Interim Status Standards. The survey participants concurred that these standards would not be required until the facility began its recycling operation or if its waste generation changed. Mr. Patrick said he would notify the EPA when they began such operation.

Inspectors' Names: Diana Shannon

Loys Parrish

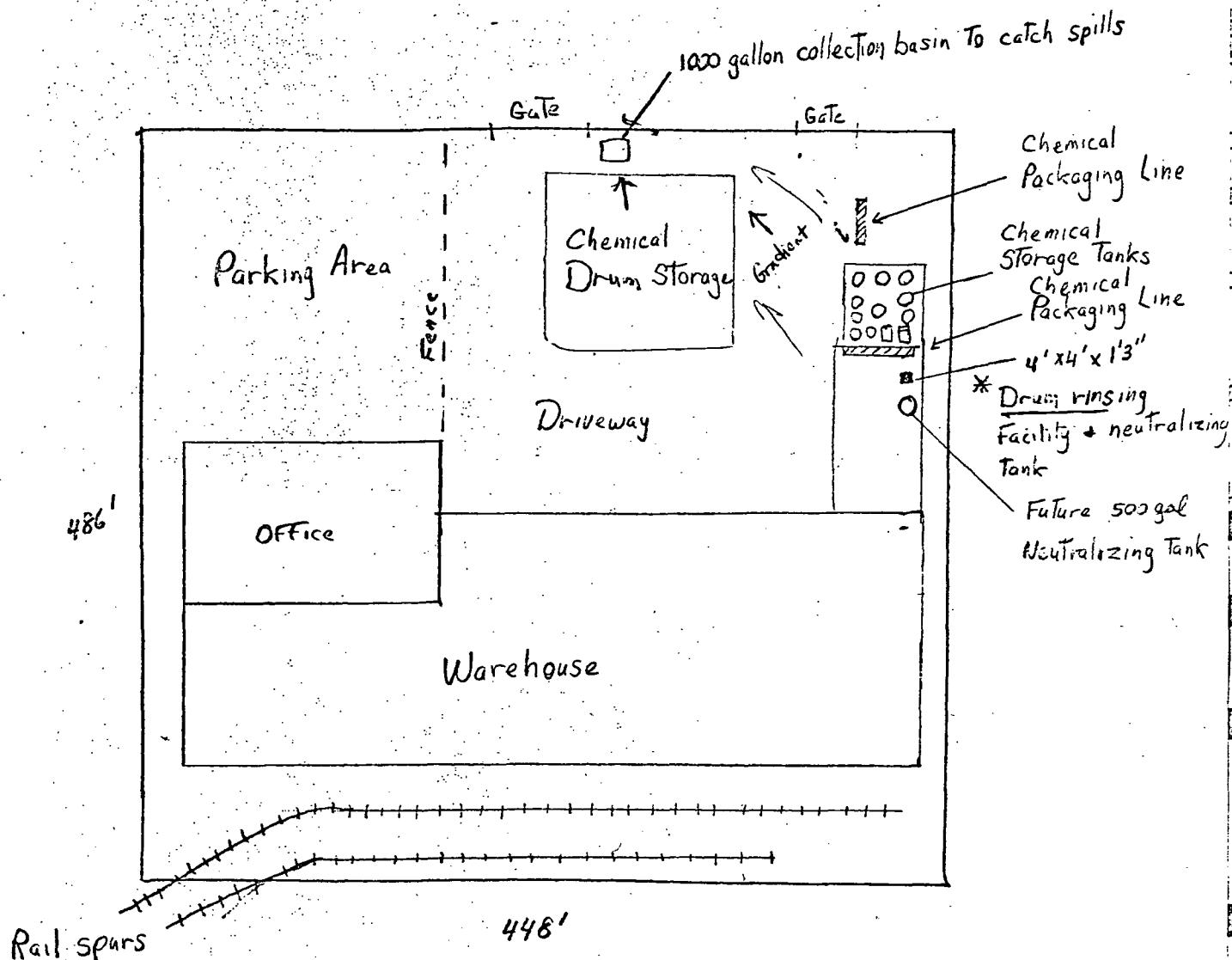
Signatures:

Diana Shannon

Loys Parrish

Date: March 17, 1981

**FACILITY DRAWING (see page 4)**



\* Process: We rinse empty corrosive drums with 5 quarts of water. We then neutralize the rinse water and dump it into the sanitary sewer

Van Waters + Rogers

Feb. 26, 1981

4300 Holly St.

COD 675-770560

Denver, CO

Tele: 388-5651

Weather Conditions: cloudy, approx. 45°F

Notified as: GEN., TRANS., TSD.

Time: In: 1:30pm Out: 2:45pm

Survey Participants:

Diana Shannan, lead

Lays Parish, S&amp;A Division

Robert T. Patrick, Op. Manager

Robert Marks, Warehouse Manager

Facility Description - Mr. Patrick says they are not generators but it is company policy to have notified.

TRANSPORTATION - they will be transporting solvents (chlorinated or fluorinated) at any time in the future. They will manifest <sup>all</sup> the waste. Manifest used: J.J. Keller & Associates

WASTE STREAM -

- ① Rinsing corrosive drums HCl, HNO<sub>3</sub>, H<sub>2</sub>SO<sub>4</sub> or caustic soda or potash. drums are essentially dry, 5 gal. of water flush, put into 150 gallon tank, when approaching full they check pH, neutralize then discharge to sewers. They have discussed w/ denver system and Denver is not too concerned. Neutralization, pretreatment.
- ② Van Waters + Rogers will not accept drums that have more than 1/2 inch.
- ③ Spill tank - they have not had spills of chemicals. The area is sloped to spill catchment. pH is

Van Waters & Roger

Feb. 26, 1981

checked, then pumped to storm sewer. 1000 gallon capacity.

(3) Unloading from tank cars, package materials for distribution or reship in tank trucks.

(4) Storage of spent solvent drums, most likely put back into clean drums (maybe tank cars.)

\* They seem to qualify for Interim Status, but no requirements are checked because they don't handle any hazardous waste. ~~It~~ They will notify the EPA when they begin solvent recycling.

\* They will transport when required. And fill in Annual Report next year.

\*\* Dow Chemical seminar. Superfund discussion "when 1 lb. is spilled they must contact the Nat'l Coast Guard #, (Washington)

(1) Does the State override this - no.

(2) Is local authority good enough - no.

(3) Quantities - 1 lb. of the listed materials in the Superfund act.

Louys Parrish: Field Notes (7)

2/26/81

Don Waters & Rogers

4300 Kelly St.

Denver CO 80216

CODOT 5770560

Contact: Robert Patrick, operations mgr.

Time in: 1:30 pm

Participants

Diana Shuman

Louys Parrish

Bob Marks - Warehouse manager

Robert J. Patrick Operations Manager

Weather cond. Overcast,  $\approx 45^{\circ}\text{F}$

Notified as: Generator, transporter, storage  
& disposal.

Have transported wastes to be recycled:  
(Chlorinated or Fluorinated solvents)

Co. has a manifest form & labels for  
waste shipment. All wastes are  
manifested.

Waste stream from barrel rinsing -

corrosive drums -  $\text{HCl}$ ,  $\text{H}_2\text{SO}_4$ , Caustic soda, Potash,  $\text{HNO}_3$

Each barrel washed with 5 gal. water  
in wash tank (122 gal cap.) Full

Rinsing from drums exempted for 3 reasons. (8)

pH checked & neutralized, & liquid  
flushed down sanitary sewer.

Drums are usually empty.

To date, have not had spill from  
chem drum storage.

Black top & concrete storage area

Tank storage has return wall.

Waste in basin checked for pH &  
pumped to storm sewer. (usually rain  
or wash water.)

There is some unloading from tank  
cars. Acids & caustics. Packaged &  
also shipped in tank trucks.

May have future 90 day storage of wastes.  
Company intends to recycle in future.

didn't check interim status because  
not required at this time. When recycling  
starts, company will notify.

L. Parrish



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

1860 LINCOLN STREET  
DENVER, COLORADO 80295

REF: 8AH-WM

Mr. Robert Patrick, Operations Manager  
Van Waters & Rogers  
P.O. Box 5287  
Denver, Colorado 80217

Dear Mr. Patrick:

Please find attached a copy of the report covering the RCRA compliance inspection conducted at your facility on February 26, 1981.

The inspectors noted that you do not generate quantities of hazardous waste over the small quantity limit. The inspection did not include a survey of the Interim Status requirements because of the small quantities you generate. We request that you notify our office when you commence generation, transportation, treatment, storage, or disposal of hazardous waste in the quantities designated in 40 CFR Part 261.5.

Thank you for the time you made available during the inspection and the courtesy you extended to the inspectors. Should you have any questions, please contact our office at 837-6258.

Sincerely yours,

Lawrence A. Wapensky, Chief  
Hazardous Waste Facilities Section

Attachments